

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEQUE SYSTEMS INC.,

Plaintiff,

v.

Case No. 1:24-cv-00217-AJT-WEF

**BROWSERSTACK, INC., and
BROWSERSTACK SOFTWARE PVT.
LTD.,**

Defendants.

**PLAINTIFF DEQUE SYSTEMS INC.'S
MOTION FOR DISCLOSURE OF PROTECTED MATERIAL TO EXPERT**

Pursuant to the Stipulated Protective Order entered in this action (Doc 54), Plaintiff Deque Systems Inc. (“Plaintiff” or “Deque”) respectfully moves the Court for an order permitting Deque to disclose documents and information designated as Protected Material by Defendants BrowserStack, Inc. and BrowserStack Software Pvt. Ltd. under the Protective Order to Deque’s retained expert, Michael Kahaian, for the purpose of undertaking an analysis of Deque’s damages in this action. The grounds for Deque’s Motion are fully detailed in the accompanying Memorandum in Support filed contemporaneously herewith. A proposed Order also is attached hereto.

Dated: September 13, 2024

Respectfully submitted,

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Counsel for Plaintiff Deque Systems Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of September, 2024, the foregoing Motion for Disclosure of Protected Material to Expert was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which shall send notification of electronic filing to all counsel of record.

/s/ Charles W. Chotvacs
Charles W. Chotvacs